



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

November 19, 1993

VIA FACSIMILE

Mr. Jerome C. Muys, Jr.
Swidler & Berlin
3000 K Street, N.W., Suite 300
Washington, D.C. 20007

Re: Pacific Airmotive Corporation Workplan

Dear Mr. Muys:

As we discussed in our telephone conversation today, I am sending to you via facsimile EPA Region IX's guidelines for Pacific Airmotive Corporation ("PAC") to follow in developing its workplan. I understand that PAC will send its workplan to EPA within two weeks, unless you inform me that PAC needs more time to address the attached guidelines.

EPA looks forward to receiving PAC's workplan. If you have any questions concerning this matter, please contact me at (415) 744-1333.

Sincerely,

Thomas P. Mintz
Assistant Regional Counsel

cc: Rus Purcell, Kennedy/Jenks
Dr. Robert Ghirelli, RWQCB
Dave Seter, EPA-RPM

PAC WORKPLAN REQUIREMENTS

A. Pacific Airmotive Corporation ("PAC") should perform activities necessary to determine the nature and extent of vapor and non-vapor phase contamination in the unsaturated (vadose) zone resulting from releases of hazardous substances at the PAC Site. Both the horizontal and vertical extent of contamination should be determined and groundwater quality monitoring should also continue. Such investigation should include items 1 through 3 below.

1. Preparation of a plot plan showing all locations, past and present, where solvents are or were stored, used, or disposed.

2. Groundwater monitoring as follows:

a. Groundwater sampling from monitoring wells MW-3 through MW-8 according to the following schedule:

<u>Monitoring Frequency</u>	<u>Report Due</u>
January 1994	February 28, 1994
March 1994	April 30, 1994
July 1994	August 31, 1994
October 1994	November 30, 1994

b. Groundwater samples analyzed for volatile organic constituents and aromatic hydrocarbons by EPA Methods 502.1/503.1 and for jet fuel by EPA Method 8015 (Modified). Water samples analyzed without dilution at least once to detect other constituents that may exist in low concentrations in the groundwater. All analytical results should be reported in the Regional Board Laboratory Report Forms 10A/10B.

c. Groundwater samples analyzed for nitrogen and general minerals during January 1994 and July 1994 sampling events.

d. Provide all supplementary laboratory QA/QC data identified in Item No. 3 of the Regional Board's March 1, 1993 letter.

3. Soil gas investigation as follows:

a. A soil gas investigation implemented at both PAC locations, 2940 and 3003 North Hollywood Way, Burbank, California.

- b. The soil gas investigation should be based upon the requirements addressed in the Regional Board's Well Investigation Program — Work Plan Requirements for Active Soil Gas Investigation. All analytical results should be reported in the forms attached in the requirements.
 - c. Tighter sampling grids should be applied at all potential point source areas, including underground storage tanks, industrial waste clarifiers, sumps, chemical/waste drum storage areas, and industrial solvents degreasing and part cleaning areas. Multi-depth sampling should also be applied to these areas to a minimum of 15 feet below the ground surface.
 - d. A contingency plan should be included to add additional sampling points in case high concentrations of compounds are detected during the investigation.
 - e. A determination will be made regarding the need to install nested soil vapor probes and soil cleanup alternatives based upon the first phase of soil gas investigation to be completed.
- B. PAC should maintain field and laboratory records and reports, including field logs, sample shipment records, analytical results, and quality assurance reports, to ensure that only validated analytical data are reported to and utilized by EPA and the Regional Board. Field logs should be utilized to document observations, measurements, and significant events that occur during field activities. Laboratory reports should document sample custody, analytical responsibility, analytical results, adherence to prescribed protocols, nonconformity events, corrective measures, and/or data deficiencies. All laboratory analytical results should be reported on Regional Board forms as specified above. In addition, PAC should establish a data security system to safeguard chain-of-custody forms and other project records to prevent loss, damage, or alteration of project documentation.
- C. PAC should: (i) provide notification to EPA and the Regional Board as described below; (ii) prepare a Field Sampling Plan ("FSP"); (iii) prepare a Quality Assurance Project Plan ("QAPP"); (iv) prepare a Health & Safety Plan ("HSP"); and (v) prepare a final Remedial Investigation Report ("RI"). These documents and actions are necessary to ensure that sample collection and analytical activities are

conducted in accordance with technically acceptable protocols and that data quality objectives are established and met. The FSP, QAPP, and HSP may be submitted separately or as a single document. These tasks are described in items 1 through 3 below.

1. PAC should prepare a FSP that includes the following:
 - a. A summary of the PAC Site's geographic location, and site geology, hydrogeology, and hydrology.
 - b. A summary of PAC's operational history, including the past and present location of underground and above-ground tanks, baths, vapor degreasers, clarifiers, or other structures where solvents are or were used, stored, or discharged.
 - c. A compilation and review of all existing site data describing the types, locations, and quantities of hazardous substances used and/or released at the PAC Site, including a review of the results from previous sampling and clean-up activities.
 - d. A detailed list of tasks to be performed.
 - e. A description of sampling objectives; sample location and frequency including quality control samples, sampling equipment, and methodologies; sample handling and analysis; and other aspects of the work to be performed.
2. PAC should prepare a QAPP that includes the following (to the extent not included in the FSP):
 - a. A description of data quality objectives.
 - b. A description of method(s) used in the investigation to document and record compliance with field and laboratory procedures (e.g., field logs, laboratory reports).
 - c. Information sufficient to demonstrate, to EPA's and the Regional Board's satisfaction, that each laboratory used by PAC is qualified to conduct the proposed work (e.g., ability to meet required detection and quantification limits for chemicals of concern in the media of interest).
3. PAC should prepare a HSP in conformance with PAC's health and safety program, and in compliance with Occupational Safety & Health Act regulations and protocols.

- D. PAC should notify EPA and the Regional Board of planned dates for field activities at least one week before initiating sampling so that EPA or the Regional Board may adequately schedule oversight tasks.
- E. After completing field sampling and analysis, PAC should prepare a draft RI describing the results of the remedial investigation. The RI should:
 - 1. Include a review of all investigative activities that have taken place.
 - 2. Include an analysis and evaluation of the data to describe physical characteristics of the PAC Site, contaminant source characteristics, the nature and extent of contamination in the unsaturated zone, and contaminant fate and transport.
 - 3. Describe and display data which document the location, types, physical state, and concentration of contaminants at the PAC Site.
 - 4. Demonstrate that quality assurance requirements specified in the FSP and QAPP are met.
 - 5. Include as appendices a summary of all validated data, field logs, chain of custody forms, and any other information used to document the findings of the remedial investigation.
- F. All documents, including technical reports, and other correspondence to be submitted by PAC should be sent by U.S. mail to the following addressees:

David Seter, Remedial Project Manager (H-6-4)
Hazardous Waste Management Division
U.S. EPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Dr. Robert Ghirelli
California Regional Water Quality Control Board
101 Centre Plaza Drive
Monterey Park, California 91754
- G. PAC should notify EPA and the Regional Board in writing of the name, title, and qualifications of the individual(s) who will be responsible for carrying out the work outlined above.

FAX TRANSMISSION

TO

NAME : JEROME C. MUYS, JR.


ORGANIZATION : SWIDLER & BERLIN

MAIL STOP :

FAX NO. :	Area Code 202	Number 424-7643
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VERIFICATION NO.:	Area Code 202	Number 424-7523
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FROM

NAME :  THOMAS MINTZ
Office of Regional Counsel
U.S. Environmental Protection
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75 Hawthorne Street
San Francisco, CA 94105

BRANCH :

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PHONE NO. :	Area Code 415	Number 744-1333
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FAX NO. :	Area Code 415	Number 744-1041 FTS 484-1041
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DATE 11.19.93

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SUBJECT PAC WORKPLAN

NOTE

MESSAGE CONFIRMATION

DATE:11/19/93 TIME:19:35

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